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July 22, 2025

Re: *United States v. Tyquan Brown*
Dkt.: S3 23 Cr 157 (KMK)

Hon. Kenneth M. Karas
United States District Judge
United States Courthouse
300 Quaropas Street
White Plains, New York 10601

Dear Judge Karas:

I have been appointed by this Court to represent Mr. Brown in the above matter. I have spoken with Mr. Brown, Mr. John Wallenstein, Esq. (prior counsel), AUSA Kaiya Arroyo, and Mr. Brown's family. I have arranged to meet with AUSA Arroyo at her office this Thursday to review discovery material, and I am scheduled to receive from Mr. Wallenstein his file in this case by week's end. I am scheduled to meet with Mr. Brown at WCJ this coming Monday, July 28, 2025. I have reviewed the docket sheet in this matter.

First and foremost, I need time to get up to speed on this matter. I think between the cooperation of the government and prior counsel, I will have in my possession and have reviewed the relevant materials with Mr. Brown within the next two weeks. I understand that a final draft of the probation sentencing report has been produced, but Mr. Brown wishes me to make further objections to this report, particularly if the prior plans for a *Fatico* hearing are to be realized. [See Dkt Entry 64, *Letter to the Court from AUSA Arroyo dated June 25, 2025*]. I think that will take another two weeks. Then I will need to receive an updated PSR addressing Mr. Brown's objections. Finally, I will need to submit my sentencing materials to the Court, the government will need to submit their materials (or updated materials if the parties have previously submitted sentencing materials), and this Court will need to decide if a *Fatico* hearing is required.

Therefore, with the consent of Mr. Brown and without objection from the government, I propose adjourning the upcoming court date of July 29, 2025, and setting the following schedule:

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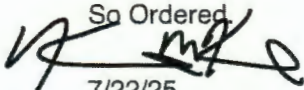
July 22, 2025
Page 2

Defense Objections to the PSR	August 6
Probation Response to Objections and updated PSR Recommendation	August 20
Defense Sentencing Materials	August 27
Government Sentencing Materials	September 4
<i>Fatico</i> hearing and sentencing	September 15-19, or 22-26, 2025

I thank the Court for considering my request.

The schedule for submission of materials is approved. The Court will schedule the sentence when it is clear whether there will be a *Fatico* hearing.

So Ordered


7/22/25

Very truly yours,

Sam Braverman

Samuel M. Braverman, Esq.
National Co-Chair,
Government Enforcement,
Internal Investigations, and
White-Collar Defense Group